REMARKS

This response is to the Office Letter mailed in the above-referenced case on June 22, 2004. Claims 1-21 are presented for examination. The Examiner points out the proper use of trademarks in the specification. Applicant acknowledges the Examiner's objection to claim 10 and corrections are made accordingly. Claims 1-21 are rejected under 35 U.S.C. 103(a) as being unpatentable over Joseph Shi-Piu Fong (USP 6,704,747) hereinafter Fong, in view of Madan et al. (USP 6,748,374) hereinafter Madan.

The applicant has carefully noted and reviewed the Examiner's rejections, references and comments. Applicant herein amends claim 10 to correct an error in text, and corrects the specification for any misuse of trademarks. Applicant herein argues the patentability of the claims over the art provided by the Examiner.

Regarding claim 1 the Examiner states that Fong teaches all of the limitations of the claim with the exception of a code generator for scanning the representative model and generating the appropriate application code for each node in the representative model.

Applicant argues that Fong fails to teach the "models" and functionality of said models as claimed in applicant's claim 1. Applicant argues that Fong teaches a method for accessing information from a relational database in a object oriented way as explained in the background portion of applicant's specification. If a user wishes to access the information from database 105 in an object oriented way, as in Fong, a user must execute a database query that is based on a primary key and adheres to a predefined predicate that is already mapped and coded. If a user desires to access information in a non-standard way using a random or arbitrary predicate that is not already predefined, the user would not be able to do so without writing the code required to proceed successfully.

For the first time in the art applicant provides a system and method for a query-abstraction and code-generation process that addresses the above issues by

exploiting the information captured in object models and in SQL in order to enable user-friendly access to an RDBMS based on any arbitrary predicate or non-typical primary key based data access method.

Fong teaches a system which re-engineers the RDBMS in order for the system to be accessed in an object-oriented way. Fong generates a Frame model database which maps the semantics of the RDBMS and then transfers and translates all of the data from the RDBMS into the model. Fong must then manually query for hidden semantics. Fong teaches one model for any given legacy database. Fong's model (Frame) does not differ from one type of database to another, or one type of modeling to another, therefore, needing a code generator for the application is not required.

In applicant's invention, code is automatically generated via a parser reading from a query specification and model information. Using this information, an internal representation (model) of the aggregated information is constructed using a model-based generative approach. The model is then scanned and code is supplied for each represented node in the representation. The code can be generated for different standard implementation technologies like open database connectivity (ODBC), java database connectivity (JDBC), or embedded SQL.

Applicant argues that there is absolutely no motivation in the art to combine the art of Fong and Madan as espoused by the Examiner because generating code would not benefit or enhance the art of Fong in any manner.

Applicant points out to the Examiner that in order to support the conclusion that the claimed invention is directed to obvious subject matter, either the reference must expressly or impliedly suggest the claimed invention or the examiner must present a convincing line of reasoning as to why the artisan would have found the claimed invention to have been obvious in light of the teachings of the reference. Both the suggestion to make the claimed combination and the reasonable expectation of success must be founded in the prior art and not in applicant's disclosure. Applicant argues that the concept of using a code

generator for scanning the representative model and generating the appropriate application code for each node in the representative model is only suggested in applicant's invention.

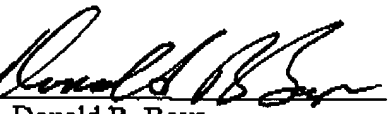
Applicant believes that claim 1 is patentable over the art of Fong and Madan, either singly or combined. Claims 2-9 are patentable on their own merits, or at least as dependent upon a patentable base claim.

Regarding claims 10 and 16, applicant believes these base claims are also patentable as argued above on behalf of claim1. Claims 11-15 and 17-21 are patentable on their own merits, or at least as dependent from a patentable claim.

In view of the above arguments by the applicant, it is clear that the references fail to support a 103(a) rejection for the claims in applicant's present invention. It is therefore respectfully requested that this application be reconsidered, the claims be allowed, and that this case be passed quickly to issue.

If there are any time extensions needed beyond any extension specifically requested with this amendment, such extension of time is hereby requested. If there are any fees due beyond any fees paid with this amendment, authorization is given to deduct such fees from deposit account 50-0534.

Respectfully Submitted,
Arun Gajanan Bahulkar et al.

by 
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